

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JIMI ROSE,)	CIVIL RIGHTS ACTION
Plaintiff)	
vs.)	No. 02-CV-3842
)	
CITY OF ALLENTOWN, and)	JURY TRIAL DEMANDED
ZONING HEARING BOARD OF)	
THE CITY OF ALLENTOWN,)	
Defendants)	

DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

1. The purpose of voir dire is not to pry, but to learn. Those of you who will make up the jury will have to decide this case. All of the parties need a fair and impartial jury who will decide the case solely on the evidence. The purpose of voir dire is to find an impartial jury.
2. Do you have any problems with your hearing or sight which would make it difficult for you to be a juror in this case?
3. Do you have any health problems which would make it difficult for you to sit in a courtroom and/or a jury room for a relatively long period of time and would therefore make it difficult for you to serve on this jury?
4. Have you ever served on a jury before? If so, when? Was it a civil or criminal jury?
5. Do you have any case of your own, or in which you are an interested party, that is pending in Court? If so, in what Court is it pending? What type of case is it?

6. Have you been a plaintiff (party suing) or a defendant (party sued) in any lawsuit?

If so, when, and in what Court?

7. From the brief facts and names mentioned at the outset, do you have any knowledge of this case or its facts, or of any of the parties?

8. Are you related to or do you know any party to this action, any of the attorneys representing the parties, or any of the lawyers in the law firms of those attorneys?

9. Are you related to or do you know any witness in this action? ____

10. Are you related to any party to this action in either a business or employment capacity? Have you even been?

11. Are you or any members of your family lawyers?

12. Have you or any members of your family ever studied law?

13. Do any of you work in a lawyer's office?

14. Do any members of your family work in a lawyer's office?

15. Do each of you feel that if chosen for this jury you can listen carefully to all of the evidence, and decide this case fairly, squarely, and impartially for all the parties?

16. Are you a business owner? If so, what kind of business?

17. Have you ever made application to a municipality for any type of approval? What happened?

18. Is there any reason why you believe you could not be fair in deciding whether a person has been discriminated against by a municipality?

RESPECTFULLY SUBMITTED,

James T. Huber, Esquire
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